

The Honorable Benjamin Settle

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA**

Jo Anna Lang, PR of the estate of Dick
Lang, Wife and Husband, adoptive
parents of C.L., a minor child and R.L., a
minor child, Jo Anna Lang, guardian ad
litem, for C.L. and R.L.,

Plaintiffs,

v.

STATE OF WASHINGTON,
DEPARTMENT OF SOCIAL AND
HEALTH SERVICES, (DSHS) CHILD
PROTECTIVE SERVICES, (CPS),
Kaylena Gonzalez, individually and
MARK AUSTIN GONZALEZ and as a
marital community, Pamela Williams,
individually, and Alan Robert Evans
individually and as a marital community,
Jennifer White and John DOE White
individually and as a marital community,
Laura Caruso, John Doe Caruso,
individually and as a marital community;
Sarah Coshow, and John DOE Coashow,
individually and as a marital community,
Janelle E. Redmond and JOHN DOE
Redmond, individually and as a marital
community, Lorraine Martinez, and
JOHN DOE Martinez, individually and
as a marital community, Beth A.
Kutzera, and JOHN DOE Kutzera,
individually and GLENN T. KUTZERA

NO. 3:20-cv-05057-BHS

NOTICE OF APPEARANCE

(CLERK'S ACTION REQUESTED)

as a marital community, J. Aaron Merino, and JOHN DOE Merino; Jaimee Scheffler, individually and JOHN DOE Scheffler as a marital community, and, Office of the Attorney General, State Agency, Danial Hsieh, AAG, and Vancouver Police Department, and Cowlitz County Sheriff's Department, and Eimiko Murlin and Jeff Ian Murlin, individually and as a marital community were foster parents of C.L., and Steve Vallembois, Jimmy Howard, Foster parents for R.L., individually, and Kimberly Copeland, MD, Legacy Salmon Creek Medical Center,

Defendants.

TO: JO ANNA LANG, PR OF THE ESTATE OF DICK LANG, WIFE AND HUSBAND, ADOPTIVE PARENTS OF C.L., A MINOR CHILD AND R.L., A MINOR CHILD, JO ANNA LANG, GUARDIAN AD LITEM, FOR C.L. AND R.L., Plaintiff

TO: KEVIN JOHNSON, Plaintiff's Attorney

TO: CLERK OF THE COURT

YOU AND EACH OF YOU will please take notice that STATE OF WASHINGTON, DEPARTMENT OF SOCIAL AND HEALTH SERVICES, CHILD PROTECTIVE SERVICES, KAYLENA GONZALEZ, MARK AUSTIN GONZALEZ, PAMELA WILLIAMS, JENNIFER WHITE, LAURA CARUSO, SARAH COSHOW, JAY REDMOND (INCORRECTLY IDENTIFIED AS JANELLE E. REDMOND), LORRAINE MARTINEZ (INCORRECTLY IDENTIFIED AS LARRAINE MARTINEZ), BETH A. KUTZERA, J. AARON MERINO, JAIMEE SCHEFFLER, DANIEL HSIEH (INCORRECTLY IDENTIFIED AS DANIAL HSIEH), EIMIKO MURLIN, JEFF IAN MURLIN, STEVEN VALLEMBOIS (INCORRECTLY IDENTIFIED AS STEVE VALLEMBOIS), JAMES VALLEMBOIS (INCORRECTLY IDENTIFIED AS JIMMY HOWARD), by and through their attorneys, Robert W. Ferguson, Attorney General, and ANDREW BIGGS Assistant Attorney General, without waiving objections as to improper service, jurisdiction or venue, hereby enter their appearance in

1 the above-entitled action and requests that notice of any and all further proceedings in said action
2 be served upon the undersigned attorney at the address stated below.

3 **TRANSMISSION BY FAX OR BY ELECTRONIC MAIL DOES NOT**
4 **CONSTITUTE SERVICE, UNLESS AGREED IN WRITING OR UNLESS**
5 **OTHERWISE REQUIRED BY COURT RULE.**

6 DATED this 3rd day of December, 2020.

7 ROBERT W. FERGUSON
8 Attorney General

9 s/ Andrew Biggs

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18 Mark Austin Gonzalez, Pamela Williams, Jennifer
19 White, Laura Caruso, Sarah Coshow, Jay Redmond,
20 Larraine Martinez, Beth A. Kutzero, J. Aaron
21 Merino, Jaimee Scheffler, Danial Hsieh, Eimiko
22 Murlin and Jeff Ian Murlin, Foster parents of C.L.,
23 Steve Vallembois, and James Villambois Foster
24 parents for R.L.
25
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CERTIFICATE OF SERVICE

I certify that I caused a copy of the foregoing to be served on the following persons in the manner indicated on this 3rd day of December, 2020:

☒ CM/ECF SYSTEM:

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